



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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Campbell Tract Special Recreation Permits Environmental Assessment, DOI-BLM-AK-A010-2013-001-EA

DECISION RECORD

Background

Special Recreation Permits (SRPs) are authorizations which allow specified and time-restricted recreational uses of public lands. They are issued as a means to manage visitor use, protect natural and cultural resources, and achieve the goals and objectives of the field office recreation program.

Decision

I have decided to select *Alternative 3 – Proposed Action* for implementation.

Specifically, it is my decision to authorize the following six pending special recreation permit applications for activities on the BLM Campbell Tract:

1. Alaska Dirt Divas
2. Mighty Bikes
3. Exceed Women's Running Club
4. Nordic Ski Association of Anchorage
5. Alaskan Sled Dog Racing Association
6. Chain Reaction, Incorporated

This decision is based on site-specific analysis in the *Campbell Tract Special Recreation Permit Environmental Assessment* (DOI-BLM-AK-A010-2013-001-EA) and the management decisions contained in the Record of Decision for the *Ring of Fire Record of Decision and Approved Resource Management Plan* (2008).

A Finding of No Significant Impact (FONSI) indicates that the selected alternative has been analyzed in an EA and has been found to have no significant environmental effects (see attached). Therefore, an Environmental Impact Statement is not required and will not be prepared.

Rationale for the Decision

The No Action Alternative was not selected because it would not meet the BLM's purpose for action nor would it satisfy the existing issues related to:

- No identification of appropriate group sizes to minimize conflict and maximize quality recreation experiences for all visitors;
- The lack of control over permit stipulations, monitoring, compliance, and fees collected.
- The lack of a process that allows for expedited review future requested activities on Campbell Tract and enhanced consistency among authorizations.

Alternative 3 was selected because it meets BLM’s purpose and objectives and will resolve future issues that may impact the recreation experience provided at Campbell Tract as well as the time required by my staff to review and consistently authorize requested uses.

Laws, Authorities, and Land Use Plan Conformance

The EA and supporting documentation have been prepared consistent with the requirements of various statutes and regulations, including but not limited to (EA, p. 3):

- Alaska National Interest Lands Conservation Act of 1980
- Federal Land Policy and Management Act of 1976
- National Environmental Policy Act of 1969
- National Historic Preservation Act of 1966

The project area for the selected alternative is subject to management guidance and decisions specified in:

Ring of Fire Record of Decision and Approved Resource Management Plan (2008).

The Proposed Action is consistent with the objectives outlined in the document and is not in conflict with other resources in the area. The document (BLM, 2008, p. ROD-10) specifies that “...Management of this [Campbell Tract] administrative site would continue to be guided by:

A Management Plan for Public Use and Resource Management on the BLM Campbell Tract Facility, dated June 1988.

The 1988 Management Plan covers: recreation and environmental education issues and opportunities; management objectives and constraints; and twenty management actions that make up the management program for the administrative site, none of which address the issuance of special recreation permits. The next revision to the existing 24-year old Management Plan would address Special Recreation Permits. In the meantime, helpful guidance from the existing plan includes recognition of one type of proposed SRP –competitive event – under the recreation management use category: “The trail system will be managed primarily for multiple, non-motorized trail uses, including competitive events,” (BLM, 1988).

Public Involvement, Consultation, and Coordination

The Municipality of Anchorage Parks and Recreation staff were consulted while drafting this document as many of these proposed uses occur on both BLM- and MOA-managed lands. Public scoping comment was solicited from the Far North Bicentennial Park (FNBP) Trail User Group meeting on Monday, November 5, 2012.

Additional public comment was solicited on the EA, prior to decision, from the larger FNBP Trail User Group membership, the MOA Parks and Recreation staff, existing permittees, and the six SRP applicants via e-mail.

The EA was made available for public review and comment from January 18, 2013 through February 1, 2013. Comments were received from eleven parties. All comments submitted were reviewed and categorized as either “substantive” or “non-substantive” based upon the guidance defined in the BLM’s National Environmental Policy Act Handbook H-1790-1 (BLM 2008).

Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS or EA.
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used in the environmental analysis.
- Present new information relevant to the analysis.
- Cause changes or revisions in one or more of the alternatives.

Comments that were non-substantive include the following:

- Comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above.
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above.
- Comments that do not pertain to the project area or the project.
- Comments that take the form of vague, open ended questions.

In summary, the comments highlighted concerns about group sizes, staged group departures, methods to encourage the prevention of weed transport, requirements to prevent trail surface degradation, food carry and wild animal safety requirements, competitive events on Non-Tour of Anchorage Route trails during the snow season, requirements to coordinate with the Municipality of Anchorage, a description regarding user skills on Tour of Anchorage Route versus Non-Tour of Anchorage Route trails, impacts to groomed winter trails, the limited use of Salmon Run trail, allowable parking spaces at BLM trailheads, and support for the No Action Alternative. All substantive comments as well as the BLM’s responses to those comments are attached to this Decision Record. The attachment indicates how each comment was addressed.

Additionally, on February 12, 2013, I met with representatives of the groups who submitted the majority of public comment received to ensure that we had a common understanding of the Special Recreation Permit process and the reasoning behind their comments. The changes made to the stipulations and within the EA are reflective of our helpful discussion.

Appeal Opportunities

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR § 4. To appeal you must file a notice of appeal at the BLM Anchorage Field Office, 4700 BLM Road, Anchorage, Alaska 99507, within 30 days from receipt of this decision. The appeal must be in writing and delivered in person, via

the United States Postal Service mail system, or other common carrier, to the Anchorage Field Office as noted above. *The BLM does not accept appeals by facsimile or email.* The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition pursuant to regulation 43 CFR § 4.21 (58 FR 4939, January 19, 1993) for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. Except as otherwise provided by law or other pertinent regulation, a petition for a stay of decision pending appeal shall show sufficient justification based on the following standards: (a) The relative harm to the parties if the stay is granted or denied, (b) The likelihood of the appellant's success on the merits, (c) The likelihood of immediate and irreparable harm if the stay is not granted, and (d) Whether the public interest favors granting the stay.

Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the Office of the Solicitor (see 43 CFR § 4.413); Office of the Regional Solicitor, Alaska Region, U.S. Department of the Interior, 4230 University Drive, Suite 300, Anchorage, Alaska 99508; at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

/s/ Alan Bittner

May 10, 2013

Alan Bittner
Anchorage Field Manager

Date

Attachments

BLM Responses to Substantive Public Comments on *Campbell Tract Special Recreation Permits Environmental Assessment*, DOI-BLM-AK-A010-2013-0001-EA

Finding of No Significant Impact, DOI-BLM-AK-A010-2013-0001-EA

References

BLM. (1988). A Management Plan for Public Use and Resource Management on the BLM Campbell Tract Facility. Anchorage: BLM.

BLM. (2008). Ring of Fire Record of Decision and Approved Resource Management Plan. Anchorage: BLM.

BLM Responses to Substantive Public Comments on *Campbell Tract Special Recreation Permits Environmental Assessment*, DOI-BLM-AK-A010-2013-0001-EA

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
3 / 1	I am particularly aggrieved about stipulating group sizes for certain trails which may require groups to have to split up. Adult to child ratios and thus safety could be compromised. The TOAR trails are less suitable for skill learning and overall mountain biking enjoyment than the narrower non-TOAR trails. Restricting larger groups to the TOAR trails would likely deter Mighty Bikes from using them because frankly, they're not as much fun as the narrower trails. Mighty Bikes uses the Hillside trails for 1 ½ hours, one night per week from June through mid-August. The impact to other trail users might be different if we were there on a daily basis.	Group Size	<p>Group Size Response:</p> <p>The intent behind setting group size limits is to reduce the effect upon the recreation experience of other visitors and maintain a safe span of control with a reasonable leader-to-participant ratio that, for instance, would allow leaders to handle situations involving wild animals safely.</p> <p>After a meeting with representatives from both Dirt Divas and Mighty Bikes, all were in agreement that a group size of 15 would work best to support their operations and was also an appropriate number for future SRP organized group requested uses of CT.</p>
3 / 2	<p>Page 15, Table 3, Sects. 1, 2 & Page 20, Table 6, Sect. 1, 2</p> <p>Group sizes of 15 riders (children and adults including coaches) are common in Mighty Bikes. We have utilized the TOAR trail system and many non-TOAR trails during single outings. Creating two thresholds of group size is inadvisable for three reasons:</p> <ol style="list-style-type: none"> 1) A group of riders over 10 in size would automatically be excluded from narrow but hardened trails such as Lore Road, Moose Track, Birch Meadow and the Lynx trails. Mighty Bikes uses the TOAR trails as a means to get to the trails that are narrow, wind through the trees and provide an enjoyable experience. Trails that are hardened and as wide as roads are not nearly as fun to ride. One of the purposes of Mighty Bikes is to increase competency and skill level on trails providing technical challenges. Since some groups of Mighty Bikes are between 11 and 15 riders, their activities would be restricted to the TOAR trails. 2) In order to maximize the utility of all the available trail options, Mighty Bike groups would have to split into smaller groups which would increase the need for adult volunteers (and thus the burden on the organization which is entirely volunteer) to manage these additional groups and would increase the total number of participants of the program. An increase in the number of bodies out on the trails creates more management and safety challenges. 3) Larger groups of 11-15 could have to divide, which would leave fewer adults responsible for the each of the split groups. 	Group Size	<p>A group size limit of 15 on ALL trails (with the exception of Salmon Run) will be used into the future.</p> <p>See related group size revisions/deletions: Table 3, Non-Snow Season Organized Group Use Minimum Permit Stipulations. Table 6, Snow Season Organized Group Use Minimum Permit Stipulations. Section 3.1.3, Direct and Indirect Effects from Alternative 2</p> <p>All permittees will have to submit participant numbers and group sizes as part of their required annual reporting. This information will help strengthen the analysis of effects and inform future planning efforts. Moving forward, the BLM and permittees may be able to develop a reporting structure that would serve future planning efforts best in helping to inform analysis to determine thresholds for different use types during different seasons at different locations.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
5 / 2	page 32-33 Proposing limits on group size should be justified rather than arbitrary numbers being suggested. We divide into two groups if our total number is larger than ten or twelve. We practice good trail use by staying on the trails.	Group Size	
7 / 10	The proposed limits on group size seem arbitrary, and we request that BLM provide information to justify these limits and the impacts on trails. We typically have 12 to 24 riders and usually split into two groups to match rider abilities. Our group rides are most frequently loops. To limit the size to 15 on wider trails and 10 on narrower trails would cause us to cap our groups at 10. Splitting into three groups is harder because we need to have enough ride leaders who know the routes and can coach other members.	Group Size	
8 / 2 8 / 20 8 / 22 8 / 23	<p>Page 15, 16—1 & 2 Because of the way trails are used, moving between TOAR and Non-TOAR trails, the effective group size limit is 10.</p> <p>...1 & 2 Again the effective limit for many groups would be 10, not 15.</p> <p>The discussion of effects is very badly organized and unclear. There is no attempt to do actual analysis. You are just making statements. Where is the analysis of the no-action alternative? The analysis needs to address in direct and indirect effects of the action, not of the group. And, again, there is no analysis of the impact of the actions on the affected groups. Some of the impacts on the group could cause indirect effects which would negate the effectiveness of the action. If an organized Alaska Dirt Diva ride has more people show up than would be allowed, groups of riders would likely choose to do a private ride on the same trails rather than leave. No less people on the trail, no less parking spaces used. Plus, the split off group could ride Salmon Run.</p> <p>The discussion at the bottom of the page is not a result of Alternative 2, as stated, but of a hypothetical situation possible, but not typical, under the no-action alternative. The group rarely rides with more than 15 people in a group for many reasons.</p> <p>Again, you don't address either direct or indirect impacts on the organization or the impact to the public that would like to ride with us, gain new skills, ride with a group of women, but are turned away</p>	Group Size	

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	<p>because we are "full-up". You need to disclose this.</p> <p>Page 34—3a This is the first mention of leader-to-participant ratio. If this is a justification, then you need to look at the existing situation. The first half of this page describes existing situation.</p>		
9 / 1	<p>Table 3: pg 15-16 – Group size limitations/trail specific: I don't agree with concept of limiting trail use given number of riders. I fail to see how this could be policed in practice and in theory is a very negative message to Mighty-Bikes, Dirt Divas or any other future group users of BLM lands. Trail etiquette is of paramount importance. We should all be allowed to utilize the park while employing responsible conduct and respect for other users.</p>	Group Size	
3 / 2	<p>requiring groups to leave staging areas in 5 minute increments is unreasonable (especially for groups of kids) and would cause unnecessary delays and degradations to program quality.</p> <p><i>Solution:</i> Group sizes of 15 riders should be able to ride TOAR and non-TOAR trails to maximize the number of trails available on a single ride, offer value-added challenges to improve riding skills and minimize safety concerns that may arise by incentivizing groups to divide into subgroups with sub-optimal participant to adult ratios. Remove the requirement of 5-minute staged departures.</p>	Staged Group Departures	<p>Staged Group Departure Response:</p> <p>After a meeting with representatives from both Dirt Divas and Mighty Bikes, all were of the understanding that many of Mighty Bike's rides intentionally disperse groups across different trails and promote adequate spacing across the groups. In addition, some of these groups stay closer to Hillside and don't enter onto BLM trails. Moving forward with this understanding of Mighty Bikes' operations, the BLM is comfortable not requiring Mighty Bikes to stage departures from Hillside, knowing that only some groups of 15 maximum, will adequately space themselves while on BLM trails.</p>
6b / 1	<p>Requiring 5 minute staged departures for Mighty Bikes and similar groups that teach children skills is problematic. These groups have up to 200 kids plus coaches. Requiring 5 minutes between groups means that the last group will be leaving 100 minutes after the first. This will be very difficult to comply with without complicated staged start times for each age/ability group. It is hard enough getting kids together at one time asking them to show up spread over a two hour period will be almost impossible let alone the burden it puts on volunteer coaches some of whom now have to stay for a much longer time each night. It is also unnecessary as these groups typically stage at Service or Hilltop so distance from BLM lands and trail choices on the way insure that by the time we get to the BLM tract we are somewhat dispersed. I hope you all would agree that teaching kids biking or skiing or running are very worthwhile endeavors and they should be encouraged not discouraged.</p>		<p>The BLM will continue to require permitted trail events and activities to adequately space out organized groups and require competitive events to utilize "wave" starts, for this reason. Unless it becomes a future concern, the BLM will not specify time spacing for staged departures. The BLM will work with permittees through compliance and monitoring inspections in the future to identify concerns over trail crowding or trail widening due to lack of spreading out or staging activity use.</p> <p>See related revisions/deletions:</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
9 / 6	Pg 37: Frosty Bottom- There is an inaccuracy in the idea that racers need to be spread out at the start of the Frosty so as to not crowd BLM trails. The event begins at Kincaid Park, nearly 20 miles away! For most riders takes at least 2 hours if not a lot more to reach BLM trails. By this time we are all well spread out. I have competed in this event the past two years, and can attest with confidence that it is only the first 10 minutes or so near Kincaid that we are a congested group.		Table 3, Non-Snow Season Organized Group Use Minimum Permit Stipulations. Table 6, Snow Season Organized Group Use Minimum Permit Stipulations. Section 3.1.3, Direct and Indirect Effects from Alternative 2.
3 / 3 3 / 6	<p><i>Page 15, Table 3, Sect. 7 & Page 21, Table 6, Sect. 9</i> <i>Comment:</i> Mighty Bikes does not have access to a water source off-site to clean mud and debris off tires and bike frames. Even if we did it would take over an hour for all kids, parents and coaches to clean their equipment before and after each ride.</p> <p><i>Solution:</i> Remove this stipulation as written as it cannot be accomplished and it cannot be enforced. Insert instead, the word "recommend" because we can recommend to kids and parents that they come to Mighty Bikes with a clean bike and stress the importance of this through education.</p> <p><i>Page 18, Table 4, Sect. 7</i> <i>Comment:</i> Summer bikes are generally not used during the non-snow season. Snow bikes with 3.7" and wider tires are used in winter and therefore unlikely to spread invasive weeds and seeds.</p> <p><i>Solution:</i> Remove this section.</p>	Prevent Weed Transport	<p>Prevent Weed Transport Response:</p> <p>BLM will add the language as follows in bold : "Encourage participants to clean mud and debris off all equipment and gear off-site before and after events to prevent the inadvertent introduction and spread of non-native invasive species."</p> <p>See related revisions: Table 3, Non-Snow Season Organized Group Use Minimum Permit Stipulations. Table 4, Snow Season Competitive Event Stipulations. Table 6, Snow Season Organized Group Use Minimum Permit Stipulations. Table 7, Non-Snow Season Competitive Event Stipulations.</p> <p>Working in partnership with our permittees helps BLM to effectively spread important educational messages. The goal of this stipulation is that permitted groups and organizations will spread this message among their participants and competitors. The BLM feels it is not unreasonable to encourage participants to hose off gear at home and expect them to arrive with clean equipment. When a participant or competitor shows up with excessive mud and debris, the permittee should take precautions to remedy the situation prior to commencing the activity.</p>
5 / 3	page 48 I am very concerned about non-native invasive plant species in the Anchorage area, including Campbell tract. Riding a clean bike is safer as it is less likely to break down. Requiring the Alaska AK Dirt Divas to enforce the cleanliness of each rider's bike is unreasonable. An individual's shoes, dogs and horses may be just as likely to transport weed propagules.	Prevent Weed Transport	
6b / 5	Organized cleaning of mud and debris off bikes prior to use is onerous for summer use and almost impossible during the winter. How would one clean a large number of bikes in the winter? Once again this is somewhat redundant in the winter, weed seed transport by winter bikes	Prevent Weed Transport	A remedy would not necessarily require a wash facility with a water hydrant, as the intent can be met through simpler means. Permittees could prepare for this by having some rags and an extra water bottle available at the trailhead, prior to the ride. The

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	<p>can't be a big contributor to invasive species spread.</p> <p>... and washing of equipment. Can you envision being required to sign a stipulation that says you will wash kids skis prior to each use in order to keep weeds out? These are the kinds of stipulations that make people ignore stipulations that do have real reason for being.</p>		<p>rags and water would be used by those bikes found by the permittee to need an extra wiping down. Similar to checking that each rider is wearing a correctly-fitted helmet, a visual check of bikes for <i>excessive</i> mud and debris is reasonable. This would encourage and reinforce not only good bike maintenance, but increase awareness and education about invasive weed species.</p>
7 / 14	<p>We can and do encourage clean bikes, because they are safer and are less likely to break down, but it would be beyond the club's ability to patrol the cleanliness of each bike. We would also like to know if there studies to show that bikes are a significant vector of invasives and greater than hiking boots, walking shoes, and feces from dogs and horses.</p>	Prevent Weed Transport	<p>This check can be included and practiced as part of the pre-ride check.</p> <p>The signing of stipulations is not a requirement. Stipulations are however, terms and conditions of an authorized, or permitted, use that the permittee is responsible to adhere to.</p>
8 / 5 8 / 26	<p>7 This is not very enforceable. Groups can certainly encourage good equipment maintenance and educate about invasive plants, but before and after cleaning is overkill. Will you require this of the general public who are more likely to ride dirty bikes?</p> <p>I keep my bike clean because it runs better, is safer, and more fun. There is no mention of studies of the impacts of bikers on spreading invasive plants. I think groups should encourage members to be mindful of keeping bikes clean for lots of reasons, including invasive plant seeds, but it is not practical to demand washing before and after each ride.</p> <p>Snow bikes are really no more likely than skis to be vectors of invasive plants. In four seasons of serious snow riding I have yet to wash my bike and it looks like it just rolled out of the shop. This is unnecessary and not based on data.</p> <p>Page 48—Alaska Dirt Diva bikes are rarely “laden with mud and debris from previous events”. The group encourages and educates members about good bike maintenance. We really don't like hanging around in the mosquitos while someone deals with an easily preventable mechanical issue. Good bike maintenance makes a better ride.</p> <p>Page 49—“Bike tires, chains, frames and associated bike gear are often laden with mud and debris from previous events during non-snow season.” Nothing could be farther from the truth! Especially in a competitive event!</p>	Prevent Weed Transport	<p>Please refer to Figure 1 (p.47), Known infestations of non-native plants in the Campbell Tract vicinity. This map clearly indicates that trails are corridors for invasive species spread through the surfacing material, the disturbance of trail tread through trail activity, construction and maintenance, as well as introduction from trail users from elsewhere.</p>

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9 / 1	<p>Weed transport: While I understand the philosophy behind cleaning bikes prior to and after trail use, I can't see how this could actually be accomplished. Access to trails is from multiple parking lots that are not set up with wash stations.</p> <p>Table 6, pg 21: Snow-season group use/mud,weeds: Major inaccuracy here, no weeds and mud issues in winter.</p>	Prevent Weed Transport	
9 / 2	<p>In several places it mentions cleaning bikes before and after use. This is a reasonable expectation and speaking for myself, this happens. Not necessarily because of concerns about vegetation [sic] but because of concerns about the maintenance of my expensive pieces of equipment. However, if it is truly a necessity to police this to make sure it is happening, the best way would be to install a bike wash facility at the trailheads. What I am not clear about is the problem of longer rides taking groups (or individuals) from other parts of the city through Campbell Tract trails and back out. How do we manage migration of seeds in this case? Again, the only way I can think of to make sure this happens is the ability to wash bikes at trailheads.</p>	Prevent Weed Transport	
3 / 4	<p><i>Page 15, Table 3, Sect. 13</i> <i>Comment:</i> Many non-TOAR trails are hardened by foreign material to withstand heavy traffic by horses and to make them sustainable during wet periods. Hardened non-TOAR trails are by definition sustainable to the heaviest impact uses such as horses. Bike tires create less impact than horse hooves. These trails were hardened to withstand heavy traffic in all weather conditions.</p> <p><i>Solution:</i> Allow Mighty Bikes to use all hardened trails on BLM land (with the exception of Salmon Run).</p>	Prevent Trail Surface Degradation	<p>Prevent Trail Surface Degradation Response:</p> <p>After a meeting with representatives from both Dirt Divas and Mighty Bikes, all were of the agreement that no rides, nor future requested trail activities, would be authorized during the spring break-up timeframe (April/May) when trails are softest and most prone to damage. Thus, the first stipulation to prevent trail surface degradation has not changed:</p> <p><i>Trail conditions are often soft due to spring melt or breakup (usually April, May), no mountain bike activities would be authorized on BLM trails during this timeframe. Such activities would be encouraged to utilize the many paved surface trails throughout Anchorage.</i></p> <p>Despite many BLM trails being hardened with foreign material intended to withstand traffic during wet periods, there still remain sections of trail that, due to a variety of reasons, get very soft with</p>
4 / 1	<p>The non-Tour of Anchorage Route (TOAR) trails as described in the EA, with the exception of Moose Meadow and the dog mushing trails, are hardened with imported foreign substances. The trail hardening was done to improve their sustainability to the highest impact trail users which are the horses. The trails are armored with gravel and crowned to allow drainage of water to prevent erosion. Hardened trails are designed</p>	Prevent Trail Surface Degradation	

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	to withstand heavy traffic and to be erosion resistant during periods of heavy rain. By definition, restrictions to the special recreation permit applicants due to weather on these trails should be minimal.		excessive rains. Reasons why a hardened, surfaced trail would still get soft includes, but is not limited to:
6b / 2	The stipulation that NonTOAR trails are off limits in rainy weather is unnecessary for several of these trails as they have been hardened for use by horses in most all weather conditions and will certainly stand up to bikes. Complying with the spring Muni trail closures should be enough. In addition Mighty Bikes for example is trying to educate kids on when trails can be used and when they can't, just putting up arbitrary closures of hardened trails(or any trail for that matter) does not further that goal.	Prevent Trail Surface Degradation	<ul style="list-style-type: none"> - surfacing not laid down uniformly - surfacing not compacted uniformly - insufficient surfacing depth - insufficient geotextile fabric subgrade to support surfacing - slumping, spread, and/or migration of surfacing - improper drainage due to trail tread migration and repeated use wearing down the trail crown intended to direct drainage to trail edge - overall poor drainage due to trail crown wearing down and depleting side drainage - tree and vegetation litter build-up inhibiting drainage along trail edge - inability of BLM to perform trail maintenance and upkeep within appropriate timeframes, exacerbating of all the above
7 / 11	<p>We understand and appreciate that the trails need to be dry enough before we ride in the spring. For this reason, we do not schedule any off-pavement rides until the end of May at the earliest and during rainy periods, we avoid trails that are known to be soft and have puddles. The stipulation to restrict a handful of permittees from hardened trails from July through September if conditions are rainy is not backed up with any evidence that one group of cyclists once a week has more impact than the individual users and non-permitted groups that use these trails throughout the week. This stipulation in a summer like this past one (2012) would allow our group to use these for one month of the year (i.e. June). With the trail hardening and crowning that BLM has done to Moose Track and Lynx trails in the last few years, we do not think that these trails need to be closed during rainy periods. If the BLM insists on restricting our group use at these times, the BLM must close these trails to all users at these times.</p> <p>Regarding the potential for trail damage in warmer winter conditions (p 28), we would add the following to the list of things that will potentially rut the trail: walking or hiking without snowshoes, horseback riding, and moose walking. In addition, biking with a standard mountain bike, as opposed to one with at least a 3.7-inch-wide tire, causes far more damage than a fat-tire bike.</p>	Prevent Trail Surface Degradation	<p>For all the reasons mentioned above, the second stipulation was revised to allow the BLM authority to make calls when timeframes outside of April/May require extra caution:</p> <p style="text-align: center;"><i>When trail conditions exist outside of the April/May spring breakup timeframe that the BLM feels warrants use restrictions on certain trails, the BLM will notify permittees in advance.</i></p> <p>See related revisions: Table 3, Non-Snow Season Organized Group Use Minimum Stipulations Table 7, Non-Snow Season Competitive Event Minimum Stipulations Section 3.1.4 Direct and Indirect Effects from Proposed Action, Alternative 3 Section 3.1 Recreation Resources</p>
8 / 6 8 / 21	13 I fully support avoiding fragile conditions and ripping up trails. The key to this is appropriate construction and maintenance. Remember that bike trail construction is not the same as for hiking trails. BLM should institute	Prevent Trail Surface Degradation	<p>Additionally, the BLM retains the authority to close off trails to use at any time due to a safety and public health concern.</p> <p>The BLM does not have any designated bike-only BLM trails and</p>

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	<p>a program to rehab the trails starting with specific problem areas. How are you going to notify the public, including permittees AHEAD OF TIME, about trail closures. You can't wait until we get out there.</p> <p>Page 32—These sections are troublesome. There is no attempt to base the statements on information about how the groups use the trails. There is no information about how often Alaska Dirt Divas use the trails, which trails they use, both time of day and day of the week that rides occur, typical number of participants, and length of ride. The Divas do NOT ride dirt trails until June!</p>		<p>would welcome future input in any future trail-specific planning efforts.</p> <p>The BLM recognizes that many existing trail groups commonly practice their own self-regulation during the wet season and do not schedule any rides. Regardless, it is important that the stipulation is made with the reasoning clearly spelled out to provide justification WHY any future recreation activity requests would also have to limit their use during softer trail conditions. This document will continue to be referenced and used to expedite future BLM recreation requests by other groups. By providing the supporting explanations, a logic track can be followed and applied for similar future requested uses of the trails.</p>
9 / 2	<p>Soft trail conditions: I agree that many trails are too soft for riding in April/May, but activity should not be limited July through September on non-TOAR trails. Many of these trails have been improved with gravel for sustainability/access throughout summer months for multiple uses</p> <p>Pg 28: Seasonal Trail damage: Snowbike tires are very wide and seldom destroy trail surface. Most often a group of snowbikers riding fresh snow will actually groom/pack the trail. I have encountered many skiers who are very appreciative of our riding the narrower non-TOAR trails and in essence "grooming" them.</p>	Prevent Trail Surface Degradation	
10 / 2	It's unclear in the alternatives discussion who makes the decision to use a trail after a rain or not. It implies the vendor only has to consider alternatives, but doesn't say if the agency has an oversight or not. I hope you do...	Prevent Trail Surface Degradation	
3 / 5	<p><i>Page 16, Table 3, Sect. 18</i> <i>Comment:</i> Mighty Bikes and coaches carry snacks with them to ensure that the kids have adequate nutrition to sustain 1 ½ hours of vigorous exercise. Glycogen stores in children can deplete in as little as 30 minutes of activity. Glycogen fuels muscles to perform physical activity. Snacks are not required but are strongly encouraged so that children do not exhaust themselves because their blood sugar is too low. Children</p>	Food Carry & Wild Animal Safety	<p>Food Carry & Wild Animal Safety Response:</p> <p>Black bears are very common on BLM trails and the BLM also has recent documentation from wildlife cameras of at least 10 adult brown bears using Campbell Creek and riparian areas in very close proximity to people and trails. It is for this reason that the BLM would not authorize additional uses of Salmon Run Trail and</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>who run out of steam because their caloric needs are unmet create a safety hazard for themselves and their group.</p> <p><i>Solution:</i> Allow Mighty Bikes to carry snacks on group rides to ensure that caloric needs to fuel exercise are not compromised and that the kids' nutritional energy needs are properly met. As a USA Cycling Certified Level 1 Coach I would never recommend a group of kids be allowed to participate in 1 ½ hours of exercise without access to adequate exercise nutrition.</p>		<p>why the BLM stresses proper management of food and other wildlife attractants.</p> <p>After a meeting with representatives from both Dirt Divas and Mighty Bikes, and further consideration, the BLM agrees that individuals should be able to carry food items with them while using the trails, as suggested in public comment.</p> <p>Permittees would be required to encourage participants to carry well wrapped food and cautiously consume and manage associated crumbs and microwaste that would have the potential to attract wild animals. Stipulation would be changed as follows:</p>
5 / 4	<p><i>page 43</i></p> <p>The proposal to ban food for permitted groups is not going to address the problem of bear encounters. The Alaska AK Dirt Divas are using the trails to bike, not have a picnic. We encourage members to pack a snack, that is a smart thing to do in case of low energy during a strenuous ride. If a biker has a snack we leave no trace -- we pack out whatever we brought in.</p>	Food Carry & Wild Animal Safety	<p>Encourage participants to carry well-wrapped food and snacks at the trailhead as much as possible, before commencing the activity. When stopped for a snack or water break, encourage careful consumption and management of crumbs and microliter wild animal attractants. Participants are never to set packs down and leave them unattended.</p>
6b / 3	<p>The stipulation against food is not a good idea. Young kids doing healthy exercise need to refuel. Snacks can be consumed without causing litter or attracting wildlife. Many users will at least carry food through these lands and to require that groups like Mighty Bikes can't seems to me to be overreacting to a potential problem without thinking about the consequences.</p>	Food Carry & Wild Animal Safety	<p>The BLM looks forward to continued cooperation and support of organized groups' participation in pre-event wildlife briefings and spreading the Bear Aware! educational messages among participants and competitors.</p>
7 / 12	<p>We understand the need to reduce human-bear encounters but we do not think that banning food for permitted groups will effectively address this problem. Many other users will still be carrying food and more likely to stop beside the creek for a picnic than our group is on a ride. We think that a 'no food' policy on the Campbell Tract will be unenforceable.</p> <p>We also have safety concerns about our group not being allowed to carry snacks. Some of our participants come to our rides directly from work, and we advise people carry a snack bar or other emergency food in case they become low in energy. We teach pack-in/pack-out and don't litter the trails.</p> <p>We agree that wildlife briefings are important. This is why we have hosted a Bear Aware Clinic for the club for the past few years in the spring. We have never been turned around by a bear on the trail, but we</p>	Food Carry & Wild Animal Safety	<p>See related revisions: Table 3, Non-Snow Season Organized Group Use Minimum Stipulations Table 7, Non-Snow Season Organized Group Use Minimum Stipulations Section 3.2.3 Direct and Indirect Effects from Alternative 2</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	frequently find another path to cede the trail to moose. As a group we are very safe to protect the wildlife and ourselves.		
8 / 7	<p>18 This is not enforceable and really not warranted. There is no indication that food in packs moving through the area have caused habituation or increased bear/human encounters.</p> <p>The alternatives presented are poorly thought out, in many cases unenforceable by either the agency or the group and based on a lack of understanding of the uses by the group. How will a group keep people from bringing food onto Campbell Tract? Search them? What if we find it? Dump it in the woods at the end of Rover's? Of course not! Does having an energy bar or some trail mix in your pack create a real bear problem? Are there either restrictions or request for the general public to keep food out of Campbell Tract and the parking lots?</p>	Food Carry & Wild Animal Safety	
9 / 5	No food items: Bikers, both young and old, should carry nutritional supplements while riding in excess of 1 hour or so. Limiting our ability to do so is not good/safe practice. Most often snacks in backpacks/camelbacks are in wrappers and are not bear attractants like bird feeders and dog food.	Food Carry & Wild Animal Safety	
9 / 3	Not carrying food needs to be more carefully defined. In many cases, on longer rides, it is a point of safety to have sports bars and sports drinks available to deal with the physical demands of riding and the issue of dealing with a rider who has low blood sugar, particularly in summer evening rides where people may be coming straight from work to meet up on the ride. it seems like forbidding picknicking [sic] activity including tailgate food parties would be reasonable. With the exception, of course, of the picnic area at Abbott Loop Community Park.	Food Carry & Wild Animal Safety	
3 / 5b	<p><i>Page 17, Table 4, Sect. 1, 3</i></p> <p><i>Comment:</i> These sections contradict one another. Sect. 1 states that no competitive use would be allowed on the non-TOAR trails. Sect. 3 states that the Abominable race courses must thin racers out prior to hitting the singletrack, i.e. non-TOAR trails. In addition, in the winter there is no subsurface trail damage because of snow cover and frozen ground. The only trail damage done is to the snow which is temporary.</p> <p><i>Solution:</i> Allow races to occur on singletrack during winter.</p>	Competitive Events on Non-TOAR trails during Snow Season	<p>Competitive Events on Non-Toar Trails During the Snow Season Response:</p> <p>It is difficult to spread participants out on singletrack trails and decrease impacts to other trail users. Due to concerns about the overall number of participants increasing as these events grow in popularity, the BLM will instead, require the permittees to post signs at all trailheads two hours in advance of the event and remove the signs within one hour of the event ending.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
6b / 4	The NonTOAR singletrack trails are the trails that are best for biking during the winter as well as the summer. They should remain available for use.	Competitive Events on Non-TOAR trails during Snow Season	The BLM removed the stipulation: <i>No competitive use would be allowed on the Non-TOAR trails</i>
9 / 6	Table 4: Snow-season competitive use of non-TOAR trails: Snowbiking and racing are increasing in popularity. Limiting access to trails like Moose Meadow for competition seems only to accomplish a goal of limiting public use. I hope this is not the ultimate goal! I read over and over in the EA "...reduce the effect to the recreation experience provided and enhance BLM's ability to provide a range of recreational experience." Is the assumption that the effect is always negative? Following that are limitations on the recreation! How about for someone like me and many others whose recreation experience is enhanced greatly by competing in events on BLM land! I love snowbiking and racing. Limiting the trails I can ride given the size group I am in or whether I am racing is restrictive in nature and rather than embracing a new sport the EA reads as though the BLM would rather see us all go away.	Competitive Events on Non-TOAR trails during Snow Season	and replaced it with: <i>Two hours preceeding the event, the permittee must place event notification sigs at all trailheads (Abbott Loop Community Park, Campbell Airstrip, Smokejumper) and other trail intersections(s) the BLM deems appropriate according the race route. Depending upon the size of the event, the BLM may also require signage at each trailhead two weeks in advance. Within two hours after the last finisher, the permittee must remove all signage and race route markers.</i> See related revisions: Table 4 Snow Season Competitive Event Minimum Stipulations Table 7 Non-Snow Season Competitive Event Minimum Stipulations
8 / 9	It would be helpful for the general public to have notices posted at all trailheads describing the trails that will be involved in a competitive event. A friend and I found ourselves in the middle of the Frosty Bottom, not wanting to get in the way because we support the event, but unsure what trails were involved. If it had been posted at Smokejumper, we would have planned a better route for our private ride	Competitive Events on Non-TOAR trails during Snow Season	Section 3.1.4 Direct and Indirect Effects from the Proposed Action, Alternative 3
3 / 7	Page 20, Table 6, Sect. 7 <i>Comment:</i> BLM has no jurisdiction here. On the one hand groups are encouraged to use MOA parking but as the section continues, it is stipulated that "Organized groups MUST show PROOF of an MOA daily use permit, etc." <i>Solution:</i> Keep the first sentence of Sect. 7 and delete the second sentence.	Coordination with MOA	Coordination with the Municipality of Anchorage Response: If the BLM is to authorize use across BLM and Municipal trails and the only parking area that would accommodate participants is on MOA or Anchorage School District property, the BLM requires assurance that the permittee has coordinated appropriate MOA permits or sought appropriate permissions for school parking lot use. Though the other uses do not occur on BLM land, they are associated with the BLM's authorization of the event. Likewise, the MOA directs all new recreation event inquiries to us when they
8 / 13	7 The requirement to get a permit from MOA is not clearly explained. Does this mean that all events would start at Abbott Loop Community	Coordination with MOA	

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	Park?		<p>cross both MOA and BLM lands. The BLM and MOA coordinate for many events that occur across both land ownerships.</p> <p>BLM Special Recreation Permit Administration Handbook, H-2930-1, Terms and Stipulations, page 40.</p> <p>Listed under the General Terms and Stipulations that are applicable to and made a part of all special recreation permits is the following related term:</p> <p>a. The permittee shall comply with all federal, state, and local laws; ordinances; regulations; orders; postings; or written requirements applicable to the area or operations covered by the SRP. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, or spectators under the permittee's supervision.</p>
3 / 8	<p>Page 27, Sect. 3.1.1</p> <p><i>Comment:</i> Contrary to what is stated, the TOAR trails support beginning level mountain bikers because they are wide, have long sight distances and the grade is fairly gentle (with few exceptions). Speeds can be faster on these road-wide trails because the trail width and sight distances support faster travel speeds.</p> <p><i>Comment:</i> Contrary to what is stated, the non-TOAR trails are better suited to beginner/intermediate level mountain bikers because they require more agile bike handling skills to negotiate the tight, twisty trail layout. Speeds on these trails are slower because turning radii are tighter and sight distances are shorter. With the exception of Moose Meadow and the dog sled trails, these trails have also been hardened to accommodate the heaviest use, namely, equestrian use. Mountain bike tires are lower impact than horse hooves and as such are less likely to degrade the trail than horses. It is worth mentioning here that Moose</p>	Tour vs. Non-Tour User Skill Levels	<p>Tour versus Non-Tour User Skill Levels Response:</p> <p>The BLM has incorporated some of these comments, where appropriate and within the scope of the document.</p> <p>See related revisions: Section 3.1 Recreation Resources Section 3.1.3 Direct and Indirect Effects from Alternative</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>Meadow has been compacted significantly by use over the years, is not immediately adjacent a water source such as Campbell Creek and does not degrade as significantly as Rover's Run which is not on BLM land. In addition, Moose Meadow is double-track: it has been widened by tree clearing to ensure good sight distance for two-way traffic.</p> <p><i>Solution:</i> Correct the language to reflect that the opposite is true for skill levels on TOAR and non-TOAR trails.</p>		
4 / 2	<p>My next comment is a matter of clarification. Contrary to the description in the EA, the TOAR trails are less suitable to skilled mountain bikers and more suitable to beginning riders because they are wide, hardened, have no technical features, and ample sight lines. The non-TOAR trails are better suited to the intermediate rider because they are narrow with tight turning radii. Speeds are necessarily slower on these trails than the wider TOAR trails and, I might add, more enjoyable to ride than their wider cousins.</p>	<p>Tour vs. Non-Tour User Skill Levels</p>	
7 / 9	<p>The comments regarding experienced users preferring to use straight, fast trails and beginners preferring twisty trails with short sight lines is an inaccurate assumption (p 33). For mountain bikers, the contrary is true. More experienced riders, with the possible exception of some distance racers, prefer the challenge of the rolling, twisting trails and find the wider trails (such as Viewpoint) to be uninteresting but helpful to connect us to more interesting trails. Only the most beginner riders prefer this sort of trail.</p> <p>As stated above, we disagree with the premise that more-experienced trail users prefer straight, fast routes and novices prefer twisty, low-sight-line routes, at least as it relates to recreational mountain biking. Most mountain bikers prefer trails that are more interesting, with twists and turns and possibly other challenges like roots or rocky sections. Part of the reason Singletrack Advocates (STA) was founded was to provide narrower trails after some parts of the TOAR were modified to allow better grooming in low-snow conditions (smoother surface, wider). The goal for recreational riders is to have an engaging experience. To the novice, that may be Viewpoint Trail. We've found that even the beginning mountain bikers prefer the slightly narrower trails such as Moose Track, Lynx and even Birch Meadow over the TOAR. This would support the</p>	<p>Tour vs. Non-Tour User Skill Levels</p>	

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>statement that: "The non-TOAR trails are ideal for people...learning new skills..." Whereas, the TOAR is a great way to connect these trails into a loop and put on a few extra miles.</p> <p>We disagree with the assumption that regular users on non-TOAR trails "would not expect" to encounter other trail users (p 34: Item 3c). Many in our group not only ride the non-TOAR trails but walk, ski, and showshoe here, and we expect to encounter other users. We wonder if the BLM surveyed other trail users. If so, we request that the results of those studies be included in the EA to support this assumption.</p>		
8 / 18	<p>Non-TOAR trails and appropriate use. I think you intended to say that trails are winding, not windy. They are not especially windy. Please educated the staff about mountain biking. This section misstates the motivations and intent of most mountain bikers and is also quite incorrect about the susceptibility of trails to damage. It does not take a lot of research to find out that this is not the case. You will also find that research shows that mountain bikers and no more likely to cause trail issues than hikers and both those groups are less likely than horses to cause trail damage and import invasive plants.</p>	<p>Tour vs. Non-Tour User Skill Levels</p>	
9 / 3	<p>Pg 27: TOAR/Non-TOAR and Appropriate Trail Use: The EA is inaccurate in that skilled bikers prefer non-TOAR trails to TOAR. You can reach higher speeds on TOAR trails, but most of us much prefer single-track trails for both racing and recreational riding. The EA should be edited to reflect this preference.</p>	<p>Tour vs. Non-Tour User Skill Levels</p>	
9 / 4	<p>Not sure who postulated that more experienced riders like the straight open trails and that less experienced riders like the narrow twisty trails. In point of fact, the opposite is true. In my experience beginners prefer easier grades, better line of sight, and less turning. The more experience one has the more the thrill of high speed maneuvering [sic] of narrow twisty trails is where all the skill and fun come in.</p>	<p>Tour vs. Non-Tour User Skill Levels</p>	
3 / 9	<p>Page 28 Sect. 3.1.1 <i>Comment:</i> During snow season when some of the BLM trails are groomed, fresh grooming is susceptible to "damage" or imprint by just about any mode of travel, particularly foot prints. Especially during warming trends, the post-holes of foot prints, when hardened, can create more of a negative impact than tire prints. With modern snow bike</p>	<p>Impacts to Groomed Winter Trails</p>	<p>Impacts to Groomed Winter Trails Response:</p> <p>The BLM suggests biking and horseback riding as an example activity since these tend to reflect the deepest snow pockmarks leftover when BLM staff attempts to groom trail surfaces smooth.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>technology and tire widths in excess of 3.7 inches, except for rare occasions when snow is soft enough for a snow bike tire to sink into the snow more than an inch or two, snow bikes actually groom the trails smoothly and help compact the surface. Runners often comment that the trails are improved by snow bike traffic because it makes the trail surface smooth.</p> <p><i>Solution:</i> More generic language should be used to reflect that ALL uses impact fresh grooming and trail surfaces during periods of thaw.</p>		
5 / 1	<p>Limiting the use of Salmon Run as a group for the reasons mentioned in the EA is not substantiated.</p> <p>a) page 28 The Alaska AK Dirt Divas bike on Wednesday nights and educational group use is in the daytime so there is no conflict of trail use. I would suggest that if an educational group is experiencing trail use issues that temporary (and reusable) signs are posted at both entrances to Salmon Run. That way all users are aware that there is a large group on the trail and can avoid it.</p> <p>b) page 33 Bear encounter issues are a concern throughout the park, particularly on Salmon Run and Rover's Run. It is a known fact, however, that groups greater than four are less likely to have problems with bears. Individuals using Salmon Run would be more likely to have an issue with bears.</p>	Limited Use Of Salmon Run Trail	<p>Limited Use of Salmon Run Trail Response:</p> <p>As explained in the EA, the Salmon Run Trail deserves special considerations due to the important role it serves for the Campbell Creek Science Center and the potential conflicts between people and brown bears.</p> <p>Radio collar data and hair samples collected on the trail by ADF&G documented at least 20 brown bears using the portion of the stream near Salmon Run Trail. During the summer of 2012, BLM wildlife cameras documented 10 different adult brown bears using the stream near Salmon Run Trail from early June through August, very close to human activity, both spatially and temporally. The BLM posts signs to inform trail users when the presence of brown bears in the creek and on the trail is known.</p>
6 / 2	<p>I also disagree with the blanket closure of the Salmon Run trail to group use 24/7. There are plenty of times during the day when that trail is not in use for educational purposes and it would be appropriate for use by others. As it stands now a group of 5 friends skiing along that trail could ordered off the trail for lack of a permit.</p>	Limited Use Of Salmon Run Trail	<p>The trail will only be closed when the potential for a bear conflict is high (i.e., when a kill site is on or near the trail, or when there has been an incident with a bear, like a charge or an injury). If a bear is sighted or caught on camera, signs are posted, but the trail remains open, allowing trail users to make their own decisions about trail use.</p>
7 / 7	<p>There appear to be two concerns about our use of Salmon Run – interference with educational events and bear encounters. On the first, we agree that restricting group use from Salmon Run during educational events makes sense. Given that we ride on Wednesday evenings and use the trails after any school groups have left, we do not think that a total ban of use of this trail is warranted. We have never encountered an educational group on Salmon Run on weeknight evenings (p 28, 33). We suggest that instead the BLM post the trail as</p>	Limited Use Of Salmon Run Trail	<p>Permitted group activities in the evening that use the trail along salmon run are at greater risk of encountering and surprising a brown bear, particularly biking and running groups. Although these groups are usually made up of 6 or more individuals, they are moving faster along the trail, and may be spread out, increasing their chances of an encounter. Unlike the CCSC</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>closed during educational events.</p> <p>On the second concern, it is well-documented that groups greater than four are much less likely to have issues with a bear. This would indicate that groups of bikers, hikers, and other users less than four should be banned from Salmon Run. It seems like families with pets and running children would be more of an issue. They are on the trail much longer and are often drawn off of the trail to the streamside. Cyclists stay on the trail.</p>		<p>education groups that base their activities on Campbell Creek, biking and running groups have many other trail options for their activities, away from the stream and the brown bears that are using the creek in summer, thereby reducing the risk of an encounter with a brown bear.</p> <p>As stated in the EA, there are evening and weekend educational programs offered by the CCSC for families and adults year-round. The CCSC often receives Scout group or club requests outside of regular business hours or the school day. The CCSC education programs at the creek follow a bear safety plan with restrictions.</p>
<p>8 / 11</p> <p>8 / 4</p> <p>8 / 8</p> <p>8 / 25</p> <p>8 / 14</p>	<p>6 There is no opportunity offered to allow the use of Salmon Run when it is not in use for Environmental Education events. This could be easily scheduled by posting the events on a public calendar. If no events are posted by the day of an organized event, why couldn't we use the trail?</p> <p>3 It is not clear why Salmon Run is closed to winter use. It should not impact bear.</p> <p>Page 17—2 This seems reasonable to me. Salmon Run is not appropriate for competitive events</p> <p>Salmon Run Closure—What exactly is the problem to be solved? In all my years of biking, I have never, not once, with a group or a private ride, encountered an EE group. If I had, I would have turned around and backtracked. Aren't these events planned at least a day in advance? Why not post that on a publically accessible calendar. It would be easy to avoid conflicts then, as either a group or private ride. How many of the bikers on Salmon Run are on private rides? These actions would not impact that use. Is it wildlife impacts? If so, is it bears? Then why the winter ban? I've also never seen a bear there, and believe me I'm looking for them. I do know that they are there and also believe in giving them important trails and areas during salmon runs. If both conflicts with groups and wildlife are a problem then the trail should be closed to all use other than Environmental Education. Walkers with their dogs down at the creek should be more of a concern. I think that the ban on competitive events on Salmon Run is completely reasonable. Competitive events either need closed courses or wide enough courses to allow for easy passing.</p>	<p>Limited Use Of Salmon Run Trail</p>	<p>While no activity on Campbell Tract is without risk of encounters with bears in summer, reducing activities along Campbell Creek when other trails are available helps reduce the risk of injury to people, and the killing of bears for defense of life and property.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>8 & 18 No additional permits [on Salmon Run Trail]? What does this mean? In addition to what? Please clarify here and several other places in the document.</p> <p>Page 43—The discussion of impacts is not evidence based, would cause unsafe situations for people using Campbell Tract as a portion of a long ride, especially in winter, and is really not enforceable.</p> <p>Page 44—Are the impacts of winter closures of Salmon Run on bears really the same as summer closures? This doesn't make sense to me. Please clarify.</p>		
9 / 4	Prevention of human/bear conflicts: I fail to see why BLM supports CCSC youth participants access to Salmon Run, while for all other groups it is off limits. What is unique about the way in which CCSC programs utilize the trail? For education? Does this make the trail any safer?	Limited Use Of Salmon Run Trail	
9 / 6	I personally agree with the need for closing Salmon Run to bike groups. I think there need to be spaces where the animals (and apparently [sic] humans, in this case) do not have to be subjected to the stress of human encounters so that they can do things like forage for their food source without getting unduly stressed. In the past I have verbalized my support of closing Rover's Run during the period of the salmon run for the same reason. I think of this as a concession to peaceful co-existence.	Limited Use Of Salmon Run Trail	
8 / 12 8 / 16 8 / 19 8 / 24	<p>The small number of parking spaces allotted would not allow for the allowable number of users according to 1 & 2. I think that some actual data about when (time, day, and length of time) parking is a problem and if the problem is actually going to be solved by this. I've never had to park on the road. Someone is always about to leave. Blocking the gates to the Administrative Facility is clearly a problem, but you already solved that one. Maybe you need to expand or reconfigure the parking area. That should be an alternative considered.</p> <p>Page 27—See my previous comment about parking concerns. It seems that you fixed this one.</p> <p>I do understand that on at least one occasion a scheduled organized</p>	Parking	<p>Parking Response:</p> <p>The BLM does not issue permits for exclusive use of trails, trailheads, or parking lots on Campbell Tract. Even during competitive events, permittees must arrange for shuttles or passenger vans to BLM trailheads and it is required that they inform participants to courteously yield to other trail users during their activity. All of these precautionary measures are taken to allow continued access for our public visitors and not displace them elsewhere. The BLM performs monitoring and compliance checks on permittees to ensure these guidelines are being followed.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>event happened at the same time as an event sponsored by another group (a local orienteering group). A single incident hardly warrants new stipulations! How will the propose stipulations solve that problem? And why is that group not required to apply for permits as well? Are they more educational that Alaska Dirt Divas or Mighty Bikes? That is doubtful.</p> <p>Page 31—The discussion of the conflicting group events is curious. I don't think these were two groups which would be covered by the permitting stipulations. The three permitted non-snow groups all have their events on different days. Is one event really an indication of a problem? How often does this happen, requiring staff intervention?</p> <p>Page 35—How do you actually know who is parking where for these events? You can't look at a vehicle and tell why it's there. Even if my car has an organizational sticker on it, I may be on a private ride.</p> <p>Evidence of MOA permission is not a stipulation in Alternative 2, is it? This whole section is confusing in its organization. The alternatives seem to be described differently in different places. Please go through and make sure that the alternatives are stable throughout the document.</p> <p>Page 38—Again, justification is not analysis. Also, how did you come up with the "correct" number of parking spaces to be allotted? What is it based on?</p>		<p>The nearby MOA and school parking lots provide adequate parking availability that permittees can seek approvals for to access BLM lands.</p>
7 / 8	<p>This is a particularly difficult issue for Alaska Dirt Divas. One of the fundamental tenants of the Alaska Dirt Divas is to provide encouragement and training for women to try mountain biking using safe and environmentally sensitive techniques. Because of this, the group rides are publicly advertised and no prior signup is required or feasible. We always encourage carpooling, but cannot require it. There are also few vehicles that can carry more than two people plus bikes and gear. We often have members parking at various trailheads to ride through the Campbell Tract to join the group elsewhere. Some riders also bike from their homes, even "bikepooling" to the trails. We have tried to reduce our use of BLM parking lots by starting most of our rides at other venues (i.e.</p>	Parking	

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>Abbott Loop Community Park, Service High School, Hillside Trailhead). For 2013, we have agreed to not stage any rides from BLM trailheads per a request from BLM staff.</p> <p>Under the proposed action alternatives, the parking restrictions would often preclude the fully allotted number of participants for a ride. It also seems difficult to enforce this for BLM. How would the agency know which cars belong to participants? It is not clear how the agency picked the numbers of allotted parking spaces.</p> <p>It is not clear what days and what times of day the stated parking issues occur. In our experience, parking congestion is rare and very short-term. More information on parking bottlenecks would be helpful.</p>		
9 / 5	Pg 35: Parking, requiring formal permission for parking seems an undue burden for Mighty-bikes and out of BLM jurisdiction.	Parking	
9 / 5	<p>The suggestion of passenger vans was interesting to me. Even if we possessed the equipment and facilities to maintain the equipment and certify drivers to drive and maneuver [sic] such vehicles, I can imagine two passenger vans pulling up with the bike trailers carrying up to thirteen bikes per trailer. I think a passenger van and its accompanying bike trailer would take up at least six car spaces. It seems to make sense to encourage people to car pool when possible, some people can carry an extra bike or two on their car. But trailering bikes behind passenger vans is pretty substantial endeavor and the impact on the parking areas would most likely be larger than the facility expects.</p>	Parking	
2 / 1	<p>On behalf of the hundreds of competitive trail users who have participated in the Frosty Bottom and Abominable events, I recommend the BLM adopt Alternative 1 – No Action.</p> <p>As mentioned in the Environmental Assessment, there exists a long history of competitive use, including, but not limited to, skiing, running, orienteering, dog mushing, skijoring, and mountain biking. In fact, competitive use is explicitly recognized as an appropriate use of the Campbell Tract land in the 1988 Management Plan. As such, the Abominable snow bike races, as well as the Frosty Bottom events, are an entirely appropriate use of BLM lands and is consistent with the</p>	Alternative 1 – No Action - Comments	<p>Alternative 1 – No Action- Comments Response:</p> <p>The No Action Alternative would not meet the BLM's needs as specified on pages 4-7 of the EA.</p> <p>Since the BLM has not had the existing organized groups with pending applications permitted in past years, the groups have not been required to submit their annual user statistic information. By having these groups permitted, they will be required to submit this information annually which will be helpful for future planning</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>original 1988 management plan. These are grass-roots events, generally organized by volunteers for no other reason than to add vitality to our community. Subjecting the organizers to excessive and burdensome regulations stifles community involvement and could result in fewer recreational opportunities for the citizens of Anchorage.</p> <p>For events that neither start nor finish on BLM lands, but out of necessity traverse short sections of Campbell Tract trails, it does not make sense to require the organizers to seek a 10-year permit or subject them to the restrictions outlined by the other alternatives in the Environmental Assessment. Therefore, the existing Cooperative Management Agreement between the BLM and the MOA should be honored and left in place.</p> <p>Common sense suggests the adoption of Alternative 1 - No Action.</p>		efforts.
7 / 4	<p>The No Action Alternative should be expanded to include a clear description of the existing uses and the existing practices of the groups involved. This should include:</p> <ul style="list-style-type: none"> • the number of rides which occurred on Campbell Tract, • the number of participants where available, • the days of the week and times of day that the permitted use occurs, • the existing safety precautions and behavior rules/norms of the groups, • how they access the trails and • number of identified conflicts including identifying the time, location, and length of parking problems <p>Some of this information is presented in Appendix 1, but it does not seem to inform the alternatives or the analysis. For example, the three non-snow activities occur on different days of the week so the potential for conflicts appear non-existent. Without the above information there is no way to tell if the action alternatives would have any effect on the more clearly defined issues.</p>		
6 / 3	<p>I would like to comment on the alternatives section but they are difficult to read.</p> <p>My first reaction is to stick with Alternative 1) No Action, The description states that all actions will continue as currently in place. However the Table 1 states that currently permitted actions could continue and that all other (shaded) activities [sic] "will not occur" I do not agree with the latter approach.</p>	Alternative 1 – No Action - Comments	

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
8 / 3	3 & 4 Trail etiquette practices are already included in Alaska Dirt Diva organized rides and should be acknowledged in the no action alternative as well.		
6 / 1	Page 12, In Section 2, c) it leaves open the possibility of limiting use by any "group" of 2 or more people. While I suspect this is unlikely, I'm also sure we can all think of instances where someone in authority used ambiguous rules to further a personal agenda. In this case a "ranger" with a bias against a user group could have a chilling effect on use by that group.	Organized Group Use Definition	Definition of Organized Group Use Response: This definition is applied nationwide to all BLM Special Recreation Permit requests, per national guidance found in the BLM Special Recreation Permit Handbook (H-2930-1).
6 / 3	Under Alternative 2 Table 5 is also unclear as it states shaded actions "would NOT occur at all" 4 out of 6 activities stipulations are shaded, what does this mean?	Alternative Clarification	Alternative Clarification Response: Table 1 is on page 13 and represents the actions that would occur under Alternative 1. Table 2 is on page 14 and represents the actions that would occur under Alternative 2. Table 5 is on page 19 and represents actions that would occur under Alternative 3. Under all tables, the shaded areas depict which actions <i>would NOT occur</i> under the Alternative.
7 / 3	In a NEPA document, <i>issues</i> are the problems to be addressed by the actions in the alternatives. The issues, as listed appear to be <i>evaluation criteria</i> and do not clearly reflect the Purpose and Need Statement. If these are issues, we ask that they include details that give the reader an understanding of the nature of the problem, including evidence that an issue exists. Without well-written issue statements, the reader is left wondering if the alternatives will accomplish the purpose and address the need for the action. In this EA, there are many points where the existence of a real problem is doubtful. If there is a problem, it is unclear that the actions proposed would result in a change in the situation.	Issues Clarification	Issues Clarification Response: The BLM NEPA Handbook (H-1790-1) definition of an issue, for the purpose of BLM NEPA analysis, is "a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. An issue: <ul style="list-style-type: none"> • has a cause and effect relationship with the proposed action or alternatives;
8 / 1	It is unclear that the issues presented are actually problems at all. And with no data about public use presented, there is no way to tell whether they will accomplish anything at all. The apparent driving issue is staff time devoted to scheduling. Most of the affected events actually happen	Issues Clarification	<ul style="list-style-type: none"> • is within the scope of the analysis; • has not been decided by law, regulation, or previous decision; and • is amenable to scientific analysis rather than conjecture."

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	<p>on different days, according to Appendix 1. They are set up well in advance of the event and conflicts could be worked out between groups. There are pretty simple ways of addressing this, if it is a problem.</p> <p>Page 10--The issues listed are not really the issues that the alternatives need to address, but the criteria for evaluating the impacts of the alternatives. Please clearly state the actual problems, with specific data, that you are trying to resolve with the proposed actions.</p> <p>Page 13—This alternative has absolutely no detail about the current uses by the affected groups, how they currently use the trails, what the specific scheduling and parking situation. There is nothing here and this is the baseline for evaluating the action alternatives.</p>		<p>Section 1.8.1 outlines the issues, stated as questions that frame the potential cause and effect relationship between the permit authorizations and environmental effects.</p>
7 / 1	<p>Throughout this document, the approach to the agency's concerns appears to be stipulations to a few groups while the greater public continues to use the Campbell Tract as it does now. Permittees are being asked to bear the burden of use by the general public. Although permittees are the easiest group for the agency to control, they are not necessarily the cause of the problems. Based on the stated concerns of this EA, the agency must consider all of the users of the Campbell Tract, not just a few, in addressing these problems. Our group, for example, schedules rides on Campbell Tract trails approximately 10 times per year with fewer than 25 riders per event. Our impact on trails and other users' impacts must be analyzed within the context of the overall use of these trails. We suggest the agency provide documentation of the overall use of the trails to demonstrate the monthly volume of users on the Campbell Tract who are part of permitted group activities verses independent trail users.</p> <p>The EA states that groups that historically use the BLM were contacted, yet the number of entities named in this report is very small and doesn't seem to reflect all the groups on the trails. (page 6: Second paragraph from the end). We know of other organized recreation groups that use these trails and these groups are not named in this EA, so we wonder how they were contacted. We suggest that one way BLM could address some of their concerns is to seek out Letters of Agreement or Special Use Permits with other groups. This would give the agency a better idea</p>	Context of general public	<p>Context of General Public Response:</p> <p>The BLM can provide information at trailheads for the general public visitors about regulations and suggested etiquette and safety measures and when extreme circumstances exist, BLM law enforcement rangers can interact with disorderly members of the public.</p> <p>A Special Recreation Permit is granted to partners who provide a public service that is needed and aligns well with the BLM mission and a community need. Permit authorization is solely at the discretion of the BLM and, if granted, is managed by the BLM.</p> <p>The BLM would appreciate information and reports other organized groups that use BLM trails without a permit.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
	of how the trails are used and enable scheduling to avoid user and parking conflicts.		
8 / 17	There is a lack of information about other groups that use the area and why they are not required to have permits. Are permits being required equally for similar groups and activities?	Context of general public	
7 / 2	<p>The need for the action is to reduce staff time needed to track and schedule the affected events. It is not evident that the actions proposed, including the stipulations, would reduce staff time. The purpose of the action is "to manage authorized recreational land uses . . . to avoid conflicts with other authorized uses and public visitors, to ensure safety . . . and prevent the exclusion of other visitors due to parking or trail availability." No evidence is presented that demonstrates that the affected permitted activities are the cause of conflicts, safety issues, or parking concerns.</p> <p>Therefore it is unclear that the purpose will be furthered by the suggested stipulations.</p> <p>We set our ride schedule in the spring and could provide BLM with a Google calendar of proposed rides which would include Campbell Tract. If each permitted group did so, and shared their calendars, the groups could work together to resolve conflicts with little to no impact to BLM staff. This could be possible with the upcoming migration of all of the Department of Interior to Google-based email.</p>	Purpose and Need	<p>Purpose and Need Response:</p> <p>The scheduling of existing permitted uses and future uses on BLM lands is a workload and represents one part of the purpose and need for this action. As recreation activity requests continue to increase, so too, will the associated workload. Sections 1.1 and 1.3 of the EA provide additional context for the BLM's purpose and need for action. The BLM Information Technology rules limit many functions related to the use of shared Google documents and calendars.</p>
9 / 1	I am wondering why scheduling is such a problem. With limitations of trails and hours in the week, it seems logical that there are a certain number on slots available for use and that those who schedule it first get those slots. I do not know what scheduling tool the Center uses but it seems like this is a common [sic] problem easily managed with minimal effort with the appropriate scheduling management software [sic]. I just am not understanding why this is a big issue. Of course, it is the responsibility fo [sic] the group to clear their slot before showing up with their group; if that is the problem this is a management issue.	Purpose and Need	

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
7 / 5	<p>Analysis of the impacts of alternatives is lacking. What is presented is a combination of restating the alternatives and declarative statements with no supporting information. No references are cited to support the declarative statements. There is not even a mention of the impacts to the affected user groups. Some of those impacts are likely to result in other indirect impacts to resources, or the negation of the desired outcome.</p> <p>In general, there is no data presented in this document to support the need for action, to support the effectiveness of the alternatives, or to support any analysis. Although we would not suggest the kind of data collection that should go into the revision of the management plan, there is easily accessed data available from some or most of the affected organizations. No effort was made to present such information in this document.</p> <p>The analysis does not clearly indicate what change from the current situation would happen as a result of each of the alternatives. Without that information, there is no basis for the agency to make a finding on the significance of impacts, the entire point of the EA. We suggest reading the 2007 article: <i>Environmental Impacts of Mountain Biking: Science Review and Best Practices</i> by Marion and Wimpey in which the authors state that mountain bikers are no more likely than hikers to cause trail problems, including invasives and erosion/soil issues, and both are less of a problem than horses. They also suggest that proper trail design and maintenance should be the management focus before restriction of users.</p>	Problems with Analysis	<p>Problems with Analysis Response:</p> <p>Organized groups and Competitive Events that occur on BLM lands are required to have a BLM permit, refer to section 1.3. The need for action is established in the purpose and need statement, section 1.4. References are captured in section 6.</p> <p>As mentioned in the Alternative 1 – No Action- Response above: Since the BLM has not had the existing organized groups with pending applications permitted in past years, the groups have not been required to submit their annual user statistic information. By having these groups permitted, they will be required to submit this information annually which will be helpful for future planning efforts.</p> <p>The analysis among alternatives is not entirely within the context of trail surface impacts. The analysis and difference between alternatives focuses on:</p> <ul style="list-style-type: none"> • the monitoring that is not being performed by the MOA under the CMA for events they permit; • the use of an improper Letter of Agreement process and associated lack of enforcement over the required Special Recreation Permit; • potential effects to recreational users of Campbell Tract; • potential effects to the CCSC educational programs and operations; • potential effects to CT natural resources (invasives, riparian areas, trail surfaces); • potential effects to cultural resources; • potential effects to wild animals; and • potential effects to administrative functions. <p>The future, more comprehensive, land use plan-level effort may focus more on trail development, design, and use designations to guide future trail development. At such a time, a more comprehensive analysis would be performed using data from existing permitted activities.</p>

Letter # / Comment #	Substantive Public Comment	Topic	BLM Response to Comment
3 / 10	<p>Page 52, Appendix 1 <i>Comment:</i> Number of Participants—There may be 112 participants on a variety of trails but depending on coaching numbers we try to break into as small groups as possible which means that there may be more than 7 groups per evening ride.</p> <p><i>Solution:</i> Delete, "... and no more than 7 groups per evening ride."</p>	Document Revisions	Revision made, thank you.
1 / 1	The official name of the ASDRA is Alaskan Sled Dog & Racing Association.	Document Revisions	Revision made, thank you.
1 / 1	On one of your last tables you state the ASDRA does not have a designated photographer but you have left two names in	Document Revisions	Revision made, thank you.
8 / 10 8 / 14 8 / 27	<p>Page 20 & 21--Table 6 How P-38 is described is very confusing here. I think it should be listed under Non-TOAR trails here.</p> <p>8 & 18 No additional permits? What does this mean? In addition to what? Please clarify here and several other places in the document.</p> <p>References. Not a single reference was used to support any analysis. Please include references in the revised document.</p>	Document Revisions	<p>P-38 is a mushing trail in the winter, which is why it is described under the TOAR trails "during the non-snow season only."</p> <p>No additional permits refers to no permits in addition to the currently approved educationally-focused and Campbell Creek Science Center – related activities.</p> <p>References are listed in Section 6.</p>
10 / 1	<p>Do a spell check for "weed". The word "free" is missing in several instances (IE [sic] 'weed free').</p> <p>Lastly, there is no discussion of what the agency does of the vendor does follow their permit. ?</p>	Document Revisions	Revisions made, thank you.